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11 Attorneys for Defendant
12 X CORP. AS SUCCESSOR IN
INTEREST TO TWITTER, INC.

13
14 **UNITED STATES DISTRICT COURT**
15 **NORTHERN DISTRICT OF CALIFORNIA**
16 **SAN FRANCISCO DIVISION**

17 CAROLINA BERNAL STRIFLING,
18 WILLOW WREN TURKAL, and SYDNEY
19 FREDERICK-OSBORNE on behalf of
themselves and all others similarly situated,

20 Plaintiffs,

21 vs.

22 TWITTER, INC. and X CORP.,

23 Defendants.

Case No. 4:22-cv-07739-JST

**JOINT STIPULATION AND
[PROPOSED] ORDER TO STAY CASE
PENDING MEDIATION**

1 Pursuant to Civil Local Rule 6-2, Plaintiffs Carolina Bernal Strifling, Willow Wren
 2 Turkal, and Sydney Frederick-Osborne (“Plaintiffs”) and Defendant X Corp., on its own behalf
 3 and as successor in interest to Defendant Twitter, Inc. (hereinafter “Defendant”) (Plaintiffs and
 4 Defendant shall collectively be referred to as the “Parties”), by and through their undersigned
 5 counsel, hereby stipulate as follows:

6 WHEREAS, on August 24, 2023, the Court in the matter entitled *Eitan Adler v. Twitter, Inc. and X Corp.*, Case No. 3:23-cv-01788-JD (N.D. Cal.) ordered the parties to mediate the
 7 plaintiff’s claims, and the parties have scheduled such mediation to take place on December 1–2,
 8 2023;

9 WHEREAS, counsel for the Parties have conferred and agreed that the interests of
 10 preserving judicial economy and the Parties’ collective time and resources would be best served
 11 by including the pending Action within the scope of mediation ordered by the federal court in
 12 *Adler*.

13 WHEREAS, in service of judicial economy counsel for the Parties have conferred and
 14 agreed to request a temporary stay of this Action, including all currently pending deadlines,
 15 briefing schedules, court conferences, motion hearings and Court decisions through January 2,
 16 2024, given that mediation will occur in December;

17 WHEREAS, the Parties have conferred and specifically request that the Court defer ruling
 18 on Defendant’s pending Motion to Strike Portions of the First Amended Complaint, which is
 19 currently under submission with the Court, until January 2, 2024 or later.

20 NOW, THEREFORE, the Parties stipulate to the following, subject to the Court’s
 21 approval:

- 22 1. This Action shall be stayed through January 2, 2024;
- 23 2. All pending pre-trial and discovery-related deadlines shall be continued to dates
 24 after January 2, 2024;
- 25 3. The Court shall defer ruling on Defendant’s pending Motion to Strike Portions of
 26 the First Amended Complaint until January 2, 2024 or later; and
- 27 4. The Parties shall report to the Court the status of settlement discussions by January

1 2, 2024, and indicate their position as to whether the stay should be continued or lifted.
2

3 IT IS SO STIPULATED.
4

5 Respectfully submitted,
6

7 CAROLINA BERNAL STRIFLING, WILLOW
8 WREN TURKAL, and SYDNEY FREDERICK-
9 OSBORNE, on behalf of themselves and all others
10 similarly situated,
11

12 By their attorneys,
13

14 /s/ Shannon Liss-Riordan
15

16 Shannon Liss-Riordan, SBN 310719
17 Thomas Fowler (*pro hac vice* forthcoming)
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23 Respectfully submitted,
24

25 X CORP. as successor in interest to
26 TWITTER, INC.
27

28 By their attorneys,
29

30 /s/ Eric Meckley
31

32 Eric Meckley, SBN 168181
33 Brian D. Berry, SBN 229893
34 Ashlee N. Cherry, SBN 312731
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42 Dated: September 15, 2023
43

~~PROPOSED~~ ORDER

Pursuant to the Parties' Stipulation and for GOOD CAUSE appearing, the Court hereby orders that, to allow the Parties to mediate the claims in this Action:

1. This Action shall be stayed through January 2, 2024.
2. All pending pre-trial and discovery-related deadlines shall be continued to dates after January 2, 2024.
 3. The Court shall defer ruling on Defendant's pending Motion to Strike Portions of the First Amended Complaint until January 2, 2024 or later.
 4. The Parties shall submit a joint status report no later than January 2, 2024 regarding the status of settlement discussions and indicate their position as to whether the stay should be continued or lifted.

Dated: September 19, 2023

Honorable Jon S. Tigar
District Court Judge